

### **REMARKS**

Claims 1-7 and 9-41 are currently pending in the subject application and are presently under consideration. Claims 1, 11, 20, and 22-41 have been amended as shown on pp. 2-7 of the Reply.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

#### **I. Rejection of Claims 1-7 and 9-37 Under 35 U.S.C. §103(a)**

Claims 1-7 and 9-37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Liddy *et al.* (US 6,006,221) in view of Park *et al.* (US 6,064,951). It is respectfully submitted that this rejection should be withdrawn. Liddy *et al.* and Park *et al.*, alone or in combination, do not teach each and every element as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that “each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

The subject claims relate to systems and methods, which provide for a translation mechanism for storing and interacting with data in a user’s preferred language and allowing the user to easily and seamlessly switch from one language to another. Particularly, claim 1 recites a data translation system that comprises *a translation component that retrieves data in accordance with the requests and returns the data to the user in a specified language, the translation component comprising an inference component that, upon retrieval, translates result data into one or more languages, the inference component including a context analyzer component that provides an accurate translation that conforms to proper punctuation, syntax and semantics of the specified language; wherein the user is notified of a degree of confidence that the translation is accurate.*

As stated in the Office Action, Liddy *et al.* does not teach or suggest the abovementioned novel features as recited in the subject claims. The cited reference discloses document retrieval techniques that enable a user to enter a query, including a natural language query, in a desired supported languages and retrieve documents from a database that includes documents in at least

one other language of the plurality of supported languages. The user does not need to have any knowledge of the other languages. Moreover, documents and queries are processed by a set of modules that provide a language-independent conceptual representation of each document and query. The documents and queries are all abstracted to a set of categories expressed in a common representation without regard to their original language. However, Liddy *et al.* does not teach *the inference component including a context analyzer component that provides an accurate translation that conforms to proper punctuation, syntax and semantics of the specified language; wherein the user is notified of a degree of confidence that the translation is accurate.*

Park *et al.* was brought in to cure the deficiencies of Liddy *et al.* Park *et al.* provides a query transformation method enabling retrieval of multilingual web documents, which includes the steps of generating a transformation start signal when a tool button on a screen associated with the start of a transformation is clicked; starting a query transformation in response to the transformation start signal; generating all possible translations of an input query from a user by reference to a translation dictionary; and determining whether the translations are generated. If there are no translations generated, the user is informed of the fact that there is no translation generated. On the other hand, if there are translations generated, a comparison processing is executed for the generated translations, based on a semantic category tree, thereby eliminating unnecessary ones of the translations. Also, a collocation of the resultant translations is analyzed by reference to a collocation information dictionary, thereby eliminating unnecessary collocations of the analyzed translations. Furthermore, it is determined whether there are translations left. If there are translations left, the left translations are outputted as a transformed query on the screen. If there are no translations left, the generated translations are recovered and outputted as a transformed query on the screen. Here, Park *et al.* only discloses processing generated translation based on a semantics tree. However, Park *et al.* does not disclose *the inference component including a context analyzer component that provides an accurate translation that conforms to proper punctuation and syntax of the specified language; wherein the user is notified of a degree of confidence that the translation is accurate.*

Additionally claim 11 recites a database translation system that comprises *a translation component that retrieves analytical data from a database in accordance with a query and translates, upon retrieval, the resulting data into one or more user languages, the translation*

*component comprising an inference component that dynamically translates result data into one or more languages, the inference component including a context analyzer component that provides an accurate translation that conforms to proper punctuation, syntax, and semantics of the user language; wherein a user is notified of a degree of confidence that the translation is accurate.* As noted *supra*, neither Liddy *et al.* nor Park *et al.* teach or suggest the abovementioned novel features as recited in the subject claims.

In particular, claim 20 teaches an online analytical processing (OLAP) system that comprises *a translation component that retrieves data and metadata from a multidimensional database in accordance with a query and, upon retrieval, translates resulting data and metadata from a system base language into one or more user languages by utilizing an inference component that translates result data, upon retrieval, into one or more languages, the inference component including a context analyzer component that provides an accurate translation that conforms to proper punctuation, syntax, and semantics of the user language; wherein a user is notified of a degree of confidence that the translation is accurate.* As discussed above, neither Liddy *et al.* nor Park *et al.* teach or suggest the abovementioned novel features as recited in the subject claims.

Moreover, claim 22 recites a method for querying a database that comprises *utilizing context information to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the selected language; notifying a user of a degree of confidence that the translation is accurate.* However, Liddy *et al.* and Park *et al.* fail to disclose utilizing context information to provide an accurate translation that conforms to proper punctuation and syntax of the selected language and notifying a user of a degree of confidence that the translation is accurate.

Also, claim 29 recites a method of translating database data that comprises *utilizing context information to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the selected language; notifying a user of a degree of confidence that the translation is accurate.* As discussed above, neither Liddy *et al.* nor Park *et al.* teach or suggest the abovementioned novel features as recited in the subject claims.

In addition, claim 35 recites a method of interacting with a database that comprises *utilizing context information to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the selected language; notifying a user of a degree of*

*confidence that the translation is accurate.* As noted *supra*, neither Liddy *et al.* nor Park *et al.* teach or suggest the abovementioned novel features as recited in the subject claims.

Hence, Liddy *et al.* and Park *et al.*, alone or in combination, fail to teach or suggest all of the features as recited in independent claims 1, 11, 20, 22, 29, and 35 and claims 1-7 and 9-10, 12-19, 21-28, 20-34, and 36-37 that depend there from. Accordingly, withdrawal of this rejection is respectfully requested.

## **II. Rejection of Claims 38-41 Under 35 U.S.C. §103(a)**

Claims 38-41 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Park *et al.* (US 6,064,951) in view of Liddy *et al.* (US 6,006,221) and further in view of Aityan (US 2002/0169592). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Liddy *et al.*, Park *et al.*, and Aityan, alone or in combination, do not teach each and every element as recited in the subject claims

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *See In re Vaecck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In particular, claim 38 recites a method of interacting with a database that comprises *utilizing context information to translate the performance of the operation of a queried result to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the first language; and notifying the user of a degree of confidence that the translation is accurate.*

As stated in the Office Action, Liddy *et al.* does not teach or suggest the abovementioned novel features as recited in the subject claims. The cited reference discloses document retrieval

techniques that enable a user to enter a query, including a natural language query, in a desired supported languages and retrieve documents from a database that includes documents in at least one other language of the plurality of supported languages. The user does not need to have any knowledge of the other languages. Moreover, documents and queries are processed by a set of modules that provide a language-independent conceptual representation of each document and query. The documents and queries are all abstracted to a set of categories expressed in a common representation without regard to their original language. However, Liddy *et al.* does not teach disclose *utilizing context information to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the selected language and notifying a user of a degree of confidence that the translation is accurate.*

Park *et al.* and Aityan were brought in to cure the deficiencies of Liddy *et al.* Park *et al.* provides a query transformation method enabling retrieval of multilingual web documents, which includes the steps of generating a transformation start signal when a tool button on a screen associated with the start of a transformation is clicked; starting a query transformation in response to the transformation start signal; generating all possible translations of an input query from a user by reference to a translation dictionary; and determining whether the translations are generated. If there are no translations generated, the user is informed of the fact that there is no translation generated. On the other hand, if there are translations generated, a comparison processing is executed for the generated translations, based on a semantic category tree, thereby eliminating unnecessary ones of the translations. Also, a collocation of the resultant translations is analyzed by reference to a collocation information dictionary, thereby eliminating unnecessary collocations of the analyzed translations. Furthermore, it is determined whether there are translations left. If there are translations left, the left translations are outputted as a transformed query on the screen. If there are no translations left, the generated translations are recovered and outputted as a transformed query on the screen. Here, Park *et al.* only discloses processing generated translation based on a semantics tree. However, Park *et al.* does not disclose utilizing context information to provide an accurate translation that conforms to proper punctuation and syntax of the selected language and notifying a user of a degree of confidence that the translation is accurate. Moreover, Aityan discloses system for a parametric text-to-text language translation, capable to translate a text from a first source language into a second target language. The system assigns probabilities or scores to various target-language translations and then displays or makes

otherwise available the highest scoring translations. Also, Aityan provides for translation engines that are managed by the Control Center to provide the best translation for every translation, language pair, and translation theme. The Control Center is a self-learning system that runs real-time quality rating of the engaged translation engines and selects the best suitable engine for the translation session or translation request. In case of failure or unavailability of the needed translation engine, the Control Center automatically switches to the next engine selecting a translation engine with highest rating. However, Aityan is silent as to *utilizing context information to provide an accurate translation that conforms to proper punctuation and syntax of the selected language and notifying a user of a degree of confidence that the translation is accurate*. In Aityan, the Control Center is notified of the best suitable translation engine, but the user is not notified of the degree of confidence.

As a result, Liddy *et al.*, Park *et al.*, and Aityan, alone or in combination, fail to teach or suggest all of the features as recited in independent claim 38 and claims 39-41 that depend there from. Accordingly, withdrawal of this rejection is respectfully requested.

**CONCLUSION**

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP605US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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